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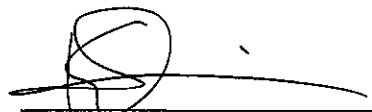
**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION**

|  |   |                                 |
|--|---|---------------------------------|
| ANGEL FRALEY; PAUL WANG; SUSAN                     | ) |                                 |
| MAINZER; JAMES H DUVAL, a minor, by and            | ) | Case No. CV 11-01726 LHK        |
| through JAMES DUVAL, as Guardian ad Litem;         | ) |                                 |
| and WILLIAM TAIT, a minor, by and through          | ) | <b>DECLARATION OF KEVIN M.</b>  |
| RUSSELL TAIT, as Guardian ad Litem;                | ) | <b>OSBORNE IN SUPPORT OF</b>    |
| individually and on behalf of all others similarly | ) | <b>PLAINTIFFS' MOTION FOR</b>   |
| situated;  | ) | <b>PROTECTIVE ORDER</b>         |
| Plaintiff,   | ) |                                 |
|  | ) | Hearing Date: February 21, 2012 |
| vs.  | ) | Time: 10:00 a.m.                |
|  | ) | Courtroom: 5                    |
| FACEBOOK, INC., a corporation and DOES 1 to        | ) | Judge: Hon. Paul S. Grewal      |
| 100, inclusive                                     | ) | Trial Date: December 3, 2012    |
|  | ) |                                 |
| Defendants.  | ) |                                 |
|  | ) |                                 |
|  | ) |                                 |

1 I, Kevin M. Osborne, hereby state and declare:

- 2 1. I am an attorney licensed to practice before all the courts of the State of California  
3 and I am admitted to practice before this Court. I am an attorney for Plaintiffs in this  
4 action. I have personal knowledge of the facts stated in this declaration, and if called  
5 upon to testify, could and would competently testify thereto. I make this Declaration  
6 in support of Plaintiffs' Motion for Protective Order.  
7
- 8 2. I have reviewed the deposition transcripts of James Duval, Susan Mainzer, and  
9 William Tait. Defendant's counsel examined each of these deponents with respect  
10 to various posts from their Facebook pages and their reasons for clicking "Like" on  
11 various pages and posts. The specific topics of these depositions included  
12 potentially embarrassing information relating to their political views (Duval, 48:15-  
13 49:13; Tait, 37:16-38:5), community group involvement (Mainzer, 65:25-67:1;  
14 99:22-115:24), and understanding of illicit drug use (Duval, 145:1-161:1).  
15
- 16 3. On February 7, 1012, our office received from Defendant a copy of the Notice of  
17 Deposition of Angel Fraley. The Notice anticipates the taking of Ms. Fraley's  
18 deposition in Seattle, Washington on February 17, 2012. Attached hereto as  
19 **EXHIBIT 1** is a true and correct copy of Defendant's Notice of Deposition.  
20

21 I declare under the penalty of perjury and under the laws of the State of California that  
22 the foregoing is true and correct, and that if called upon to testify, I could verify the accuracy of  
23 the same. This document was executed on February 11, 2012 in San Francisco, California.  
24

25  
26   
27 Kevin M. Osborne